



# **Camp Navajo Environmental Cleanup Program**

## **OB/OD Area Program Update**

**MAJ Brian Saunders**  
NGB Restoration Program Manager

**Mr. Randy Wilkinson**  
NGB Restoration Project Manager

**Stakeholders Advisory Group meeting**  
**11 October 2007**



# SAG Briefing Agenda



- Update ROD Status
- Closure Strategy
- Site Status
- CERCLA to RCRA Process
- Near Term
- Long Term



# Record Of Decision



- **NGB and ADEQ have agreed to prepare various Records of Decision (ROD's) in lieu of Decision Documents (DD)**
- **ROD's are more stringent and legally defensible than DD's**
- **ROD's will be prepared for:**
  - **The 7 OB/OD Area CERCLA Sites (MKM sites)**
  - **The 4 OB Sites (AMEC sites)**
  - **The 3 other OB/OD Area Sites (Brown & Caldwell Sites)**
    - **NAAD 02, NAAD 03, and NAAD 20**
  - **The 3 MRA Sites (CH2M Hill)**
- **Proposed Plans will be prepared for all**
  - **Except for the MKM ROD**



# Upcoming Proposed Plans & ROD's



Will be available for review at:  
NAU Cline Library  
Special Collections Area

<http://www.CampNavajoEnvironmental.org>

Send comments to: MAJ Brian Saunders  
Camp Navajo  
P.O. Box 16123  
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# OB/OD Area Site Closure Status



Site	Type	Fieldwork	RI/RSE	HHRA	ERA	DD	PP	ROD
01	CERCLA	Complete	Final	---	Final	Draft	N/A	Draft
02	RCRA	Complete	Final	Future	<u>Future</u>	N/A	Future	Future
03	CERCLA	Complete	Final	---	Final	Draft	Future	Future
04	CERCLA	Complete	Final	---	Final	Draft	N/A	Draft
05	RCRA	Complete	Final	Final	Final	N/A	Future	Future
06	RCRA	Complete	Final	Draft	Final	N/A	Future	Future
07	CERCLA	Complete	Final	Final	Final	Draft	N/A	Draft
08A	CERCLA	Complete	Final	---	Final	N/A	Future	Draft
08B	RCRA	Complete	Final	Final	Final	Draft	Future	Future
09A	CERCLA	Complete	Final	---	Final	Draft	N/A	Draft
09C	RCRA	Complete	Final	---	---	Final	N/A	<u>ESD</u>
09D	RCRA	Complete	Final	---	Final	Draft	Future	Future
10	CERCLA	Complete	Final	---	Final	Draft	N/A	Draft
13	RCRA	Complete	Final	Final	---	Draft	Future	Future
20	CERCLA	Complete	Final	Final	---	N/A	Future	Future
E76	CERCLA	Complete	Final	---	---	Draft	N/A	Draft



# Closure Strategy



- 1. Use the CERCLA risk-based cleanup process to investigate, remediate, and close out all OB/OD Area sites.**
- 2. Separate the chemical contamination issue from the munitions and explosives of concern issue, and address MEC as separate operable units.**
- 3. Focus closure of RCRA interim status permits on sites that were operated under interim status.**
- 4. RCRA Closure and Post Closure.**



# OB/OD Area Site Closure Status

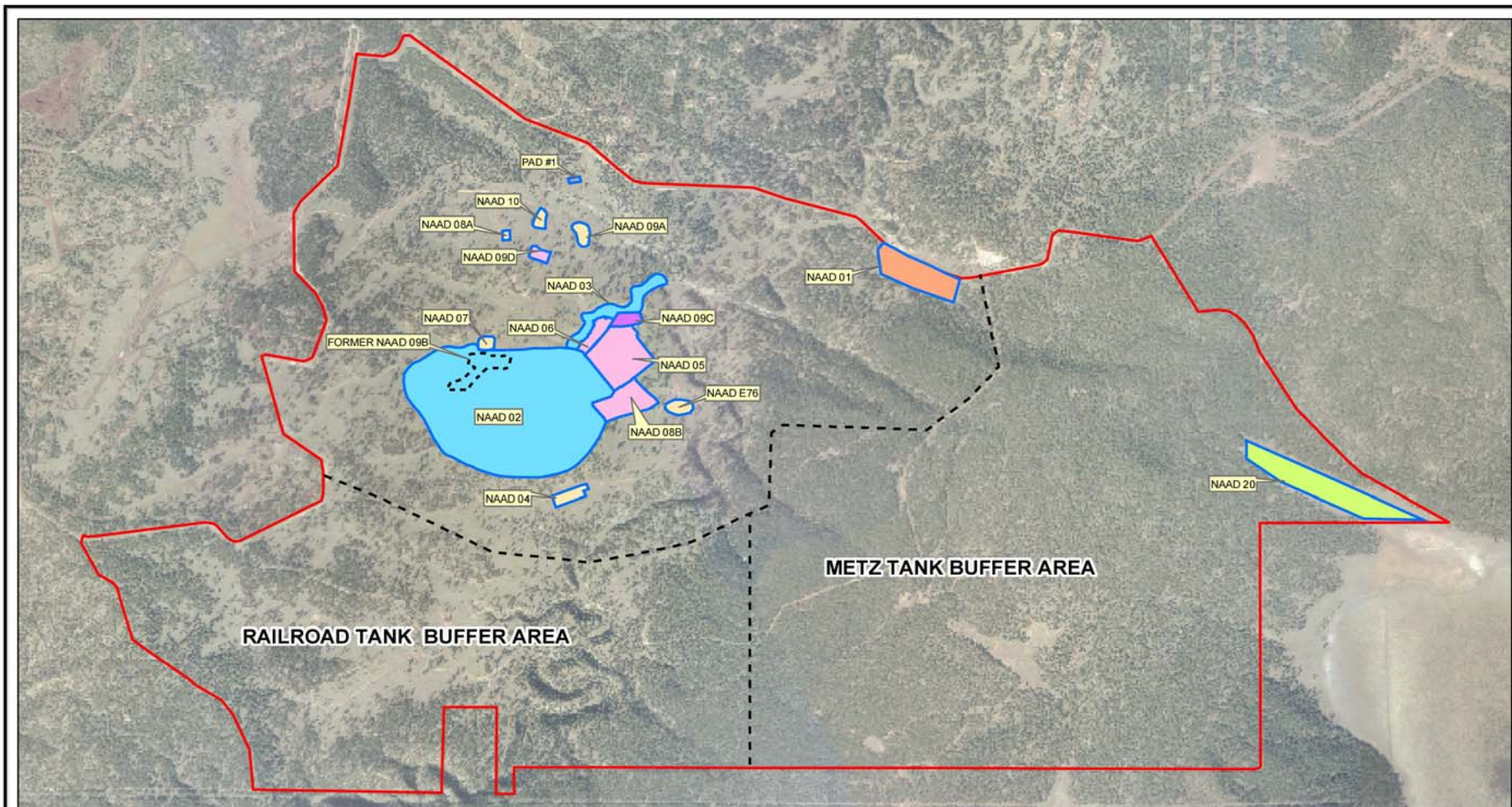


- Removal action complete at NAAD 02 (Former NAAD 09B).
  - IRA Report is due to NGB this week. Revised HERA will be included.
- NAAD 09C Removal Action Report.
  - At ADEQ for review.
- NAAD 09C and NAAD 02 IRA soil stockpiles.
  - ADEQ approved on-site management. \$3.2 million cost avoidance.
  - ESD at ADEQ, Work Plan to NGB this week, AAR with Revised HERA.
- Surface and ground water characterization – 2<sup>nd</sup> annual report.
  - NGB submitted RTC comments to ADEQ this week
- Cultural Resources – Phase 2 Treatment Plan and Draft MOA.
  - At NGB HQ
- Natural Resources – AZ ARNG drafted programmatic BA.
  - USFWS Approved BA which is good through 2012
- Supplemental MEC Characterization Project complete.
  - MEC Characterization Reports complete. CH2M preparing RTC's.
- Future land use designation still pending.
  - Information Paper drafted.





# OB/OD Area Site Closure Status



SOURCE: AERIAL PHOTOGRAPHY BY SOUTHWEST MAPPING, OCTOBER 2002

## EXPLANATION

OB/OD BOUNDARY	AMEC	CH2
CURRENT NAAD SITE	BC	MKM
FORMER NAAD SITE	BC AND CH2	MKM AND CH2
INNER FENCE		

CONTRACTOR SITES WITHIN  
THE OB/OD AREA  
CAMP NAVAJO  
BELLEMONT, ARIZONA

BROWN AND  
CALDWELL

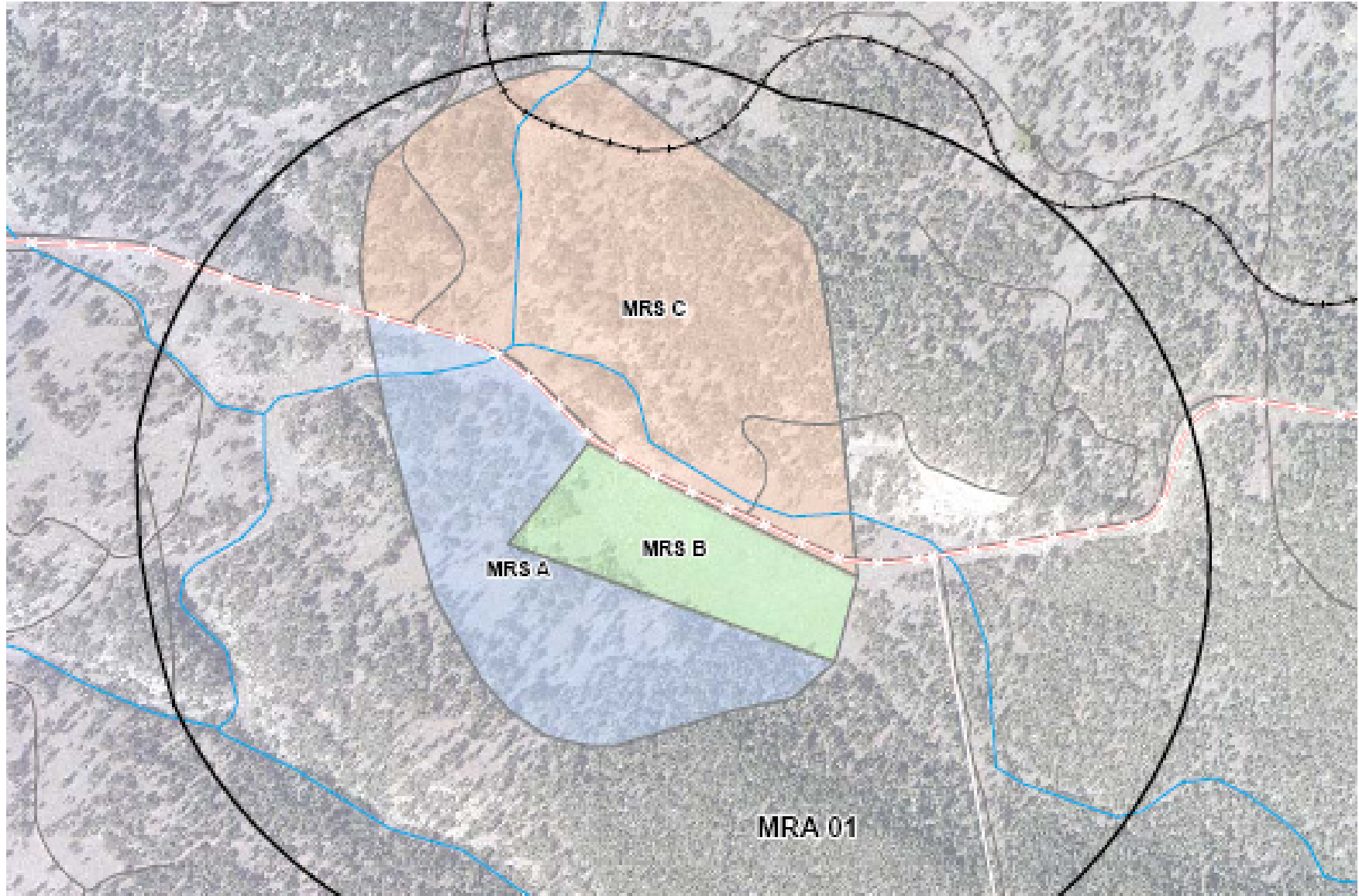
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SCALE IN FEET





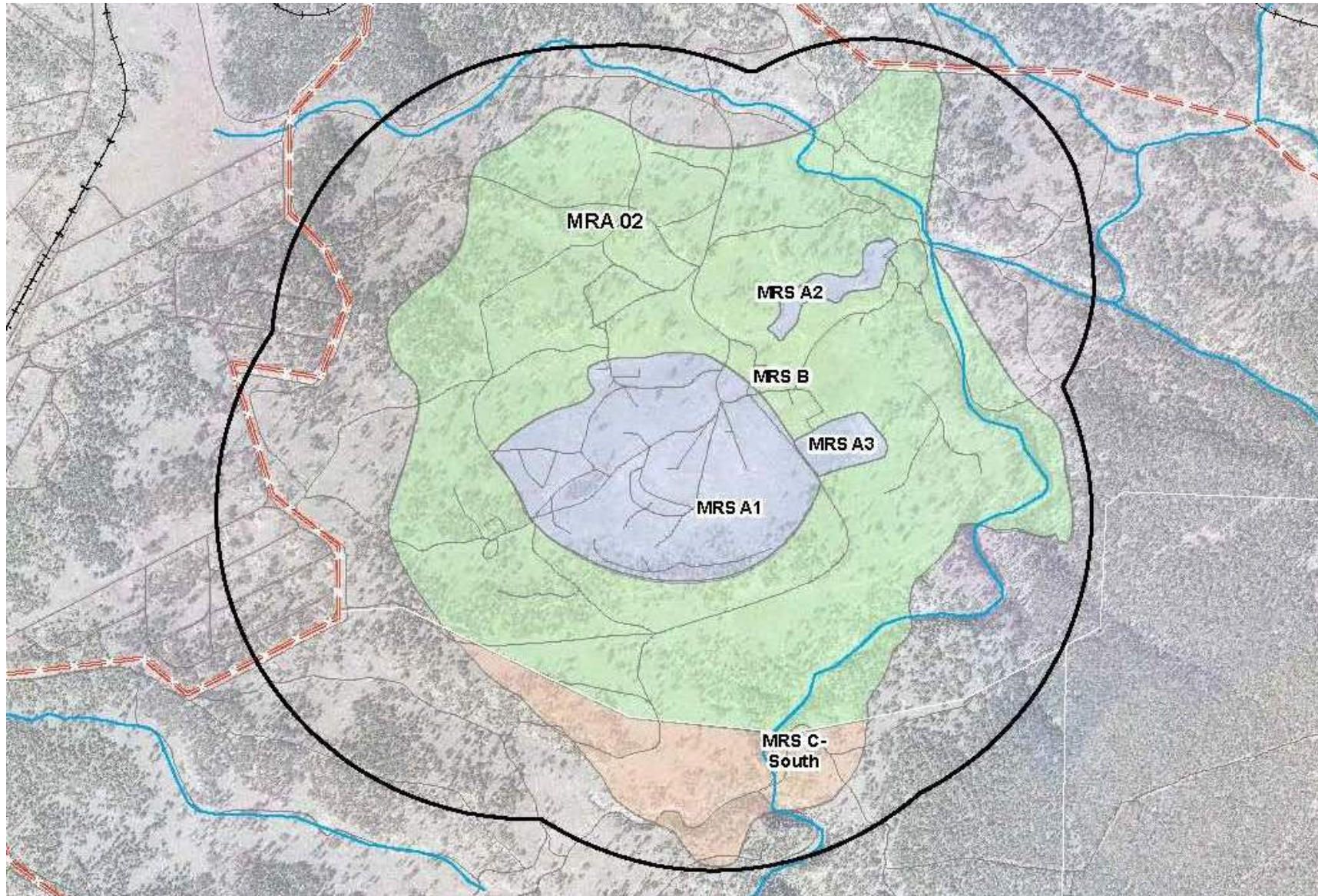


# MRA 01





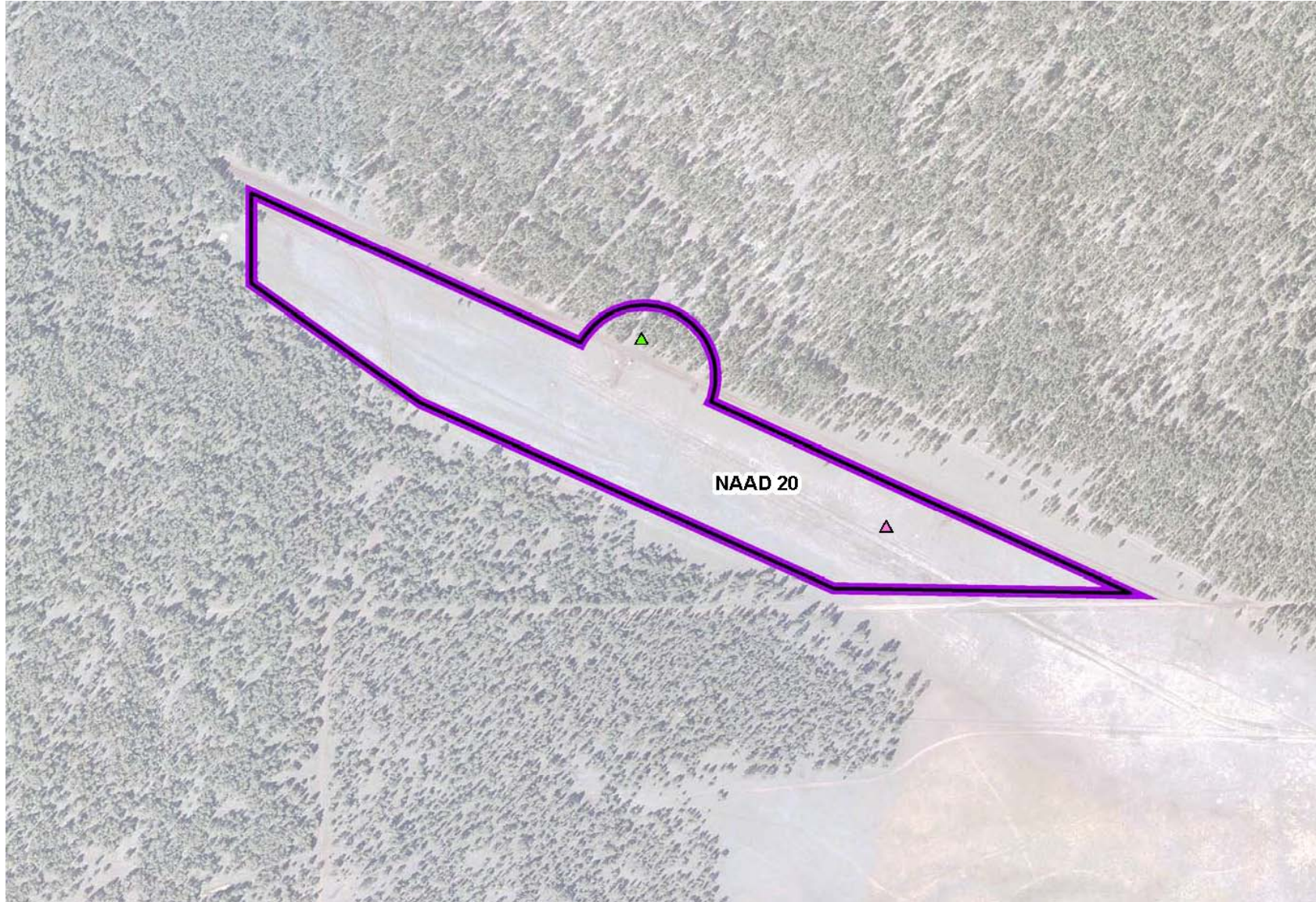
# MRA 02







# MRA 20





# MEC Closure / Post Closure Path Forward



## Near-Term

- Fieldwork - 2007
  - NAAD 02 & NAAD 09C Soil Pile Management
    - Manage Off-Site Stockpiled Soil (1,800 cy)
    - To landfill this Fall
  - MEC Interim Removal Action (IRA)
    - MEC IRA (surface removal)
      - MRA 01 – MRS C, MRS A, MRS B
      - MRA 02 – MRS C-South
  - OD Event (and possible BIP's) after MEC IRA
    - Will notify USFWS and others



# MEC Closure / Post Closure



- Reports - 2007
  - RCRA Post Closure Plan
    - Draft due to NGB 15 Oct 07
  - Engineering Evaluation/Cost Analysis (EE/CA)
    - For MRA 01, MRA 02, and MRA 20
  - MEC IRA Reports
  - Proposed Plans & ROD's





# MEC Closure/Post-Closure



## Long-Term

- Project Goals – 2008 and 2009
  - Groundwater Monitoring Variance
    - Pending ADEQ approval
  - Finalize EE/CA for MRA 01, MRA 02, & MRA 20
  - Proposed Plan/ROD for 2008 Final Removal Action (FRA)
  - TPP / FRA Work Plan – Jan 2008
  - Conduct 2008 FRA
  - Conduct 2008 NAAD 02/09C on-site soil management
  - RCRA Post Closure Permit Application - 2008
  - CERCLA Closure - 2009
  - RCRA Post Closure - 2009



# **Camp Navajo Environmental Cleanup Program POC's**



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